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CLIENT/MATTER NUMBER  
094873-0470

April 26, 2021

**Via ECF**

The Honorable John G. Koeltl

United States District Judge for the Southern District of New York

Daniel Patrick Moynihan

United States Courthouse

500 Pearl St.

New York, NY 10007-1312

*Conference adjourned from  
5/17/21 to 6/15/21 at 2:30 p.m.  
SO ordered. Jn Koeltl/US, D. S.  
4/27/21*

Re: Cotton International, Inc. v. Westin St. John Hotel Co., Inc. et al., Case No. 1:21-cv-02099

Dear Judge Koeltl:

Counsel for Defendants Westin St. John Hotel Co., Inc. and Westin Vacation Management Company (“Westin”) writes, pursuant to Rule I., E. of Your Honors Individual Practices, to request an adjournment of the Initial Status Conference. Plaintiff Cotton International, Inc. (“Cotton”) does not oppose Westin’s request.

The Court scheduled an Initial Status Conference to be held on May 17, 2021. Counsel for the remaining three named defendants (Sunset Bay Condominium Association, LLC, Sunset Bay Vacation Owners Association, LLC, and Bay Vista Owners Association, Inc.; the “Owners Associations”) have yet to file appearances in the litigation. Meanwhile, the deadline for all defendants to answer or otherwise respond to the Complaint is May 25, 2021. Accordingly, Westin respectfully requests an adjournment of the Initial Status Conference to a time between the dates (and including) June 14, 2021 and June 21, 2021, subject to the Court’s availability.

This brief adjournment should afford all parties an opportunity to engage in Rule 26(f) discovery planning after the responses to the Complaint are due, and should promote efficiency by streamlining and clarifying the issues that need to be discussed at the parties’ planning conference (including the contents of the Rule 26(f) Report), and by permitting all parties an opportunity to participate on equal footing. The parties agree to commence Rule 26(f) conferencing on May 27 or May 28, 2021.

Westin and Cotton have submitted no previous requests for the relief sought herein, and both Westin and Cotton consent to this request.

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Respectfully submitted,

*/s/Todd C. Norbitz*

Todd C. Norbitz

cc: Counsel of Record (via ECF)